

United States Court
Southern District of Texas
FILED

JAN 18 2018

David J. Bradley, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

VS.

ANSELEM EMEKA EZE d/b/a
LET'S GO THERE RESTAURANT

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CRIMINAL NO. 18-cr-

18 CR 024

INDICTMENT

The United States Grand Jury charges:

COUNTS 1-6

(Wire Fraud – 18 U.S.C. §1343)

A. THE SCHEME TO DEFRAUD

1. From on or about April 12, 2016 through on or about April 30, 2017, in the Houston Division of the Southern District of Texas, and elsewhere,

ANSELEM EMEKA EZE

defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by false and fraudulent pretenses, representations and promises, and in so doing, transmitted, or caused to be transmitted by way of wire, radio, and television communication in interstate commerce any writing, sign, signal, picture, and sound for the purpose of executing such scheme, all as more fully set forth below.

B. THE MANNER AND MEANS OF THE SCHEME TO DEFRAUD

2. Defendant was the listed owner of Let's Go There Restaurant listing an address of 6100-B Wilcrest Drive in Houston, Texas.

3. Defendant opened a merchant processing account ending in 7880 with Bank of

America Merchant Services on or about April 12, 2016 in order to be able to process credit card transactions under his business name Let's Go There Restaurant.

4. Beginning in May 2016, the Defendant began processing fraudulent credit card transactions through his Bank of America Merchants Services account. The transactions were fraudulent because the credit cards being used in the transactions had been fraudulently obtained and there was no genuine exchange of goods or services.

5. Defendant processed over 2500 transactions on his merchant account between May 2016-March 2017 for over \$420,000.00 ranging in totals between \$ 0.01 and \$7,729.00. Approximately 77 of the transactions with amounts above \$500.00 have been verified as fraudulent or charged off by the banks totaling \$295,445.00.

6. Defendant did enter into a lease agreement for the property located at 6100-B Wilcrest Drive in Houston, Texas on or about March 1, 2016. Houston Police cited the location twice for liquor violations in August 2016 and his lease was terminated by the landlord in November 2016. Many of the fraudulent transactions conducted at Defendant's business occurred after his lease was terminated, even though he told Bank of America his business was at the Wilcrest Drive location.

C. EXECUTION OF THE SCHEME

On or about each of the dates set forth below, in the Houston Division of the Southern District of Texas, and elsewhere, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the transactions described below for each count, each transmission constituting a separate count:

Count	Date	Business Name	Credit Card Account No.	Amount	Victim's Name
1	7/18/2016	Let's Go There Restaurant	xxxx-8562	\$825.00	E.B.
2	7/20/2016	Let's Go There Restaurant	xxxx-8562	\$1,267.00	E.B.
3	7/21/2016	Let's Go There Restaurant	xxxx-8562	\$1,850.00	E.B.
4	8/19/2016	Let's Go There Restaurant	xxxx-2648	\$4,200.00	B.E.
5	8/27/2016	Let's Go There Restaurant	xxxx-2648	\$5,140.00	B.E.
6	9/30/2016	Let's Go There Restaurant	xxxx-2648	\$3,122.00	B.E.

In violation of Title 18, United States Code, Section 1343.

COUNT 7

(Aggravated Identity Theft, Title 18 U.S.C. § 1028A)

On or about July 2016 in the Houston Division of the Southern District of Texas and elsewhere,

ANSELEM EMEKA EZE

did knowingly transfer, possess or use, without lawful authority, a means of identification of another person, to-wit, the name and credit card number of victim E.B. during and in relation to a violation of Title 18, United States Code, Section 1343 (Wire Fraud) as described in Counts 1 through 3.

All in violation of Title 18, United States Code, Sections 1028A.

COUNT 8

(Aggravated Identity Theft, Title 18 U.S.C. § 1028A)

Beginning on or about August 2016 and continuing through on or about September 2016, in the Houston Division of the Southern District of Texas and elsewhere,

ANSELEM EMEKA EZE

did knowingly transfer, possess or use, without lawful authority, a means of identification of another person, to-wit, the name and credit card number of victim B.E. during and in relation to a violation of Title 18, United States Code, Section 1343 (Wire Fraud) as described in Counts 4 through 6.

All in violation of Title 18, United States Code, Sections 1028A.

NOTICE OF CRIMINAL FORFEITURE

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 28, United States Code, Section 2461(c), the United States gives notice to the defendant,

ANSELEM EMEKA EZE

that in the event of conviction of wire fraud, a violation of Title 18, United States Code, Section 1343, all property, real or personal, which constitutes or is derived from proceeds traceable to such offense is subject to forfeiture.

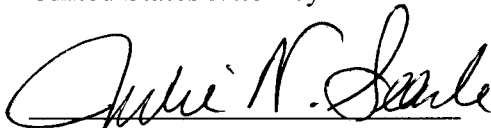
In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture. The United States may seek the imposition of a money judgment.

Original signature on File

~~FOREPERSON OF THE GRAND JURY~~

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By:


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